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FILED US District Court-UT
OCT 27 '22 PM 03:29

Attorneys for Petitioner

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

v.

YEVGENY FELIX TUCHINSKY, et. al.,

Defendants.

JUDICIAL PETITION

Case No. 2:19CR00394-RJS-DBP

Judge Ted Stewart

Jonathan Kirk Glancy, through counsel and pursuant to 21 U.S.C. § 853(n), hereby petitions for a court hearing regarding the validity of his ownership interest in forfeited property, to wit: his ownership interest in Salt Lake Commercial Properties LLC.

(i) *The particular property in which Mr. Glancy claims a legal right, title, or interest.*

Mr. Glancy claims a legal, right, and ownership interest in Salt Lake Commercial Properties, LLC ("SLCP").

(ii) *The nature and extent of Mr. Glancy's right, title, or interest in the particular property.*

Mr. Glancy owns 12.5 percent of SLCP. He purchased this ownership on May 1, 2014 (see attached tax returns, p. 51).

(iii) *The time and circumstances of your acquisition of the right, title, and interest in the particular property.*

(See above response)

(iv) *Any additional facts and documents supporting Mr. Glancy's claim.*

In support of his claim, Mr. Glancy submits the following documents, attached hereto:

- Corporate filings and tax documents demonstrating formation of Transportation Staffing Solutions LLC ("TSS") (later known as SLCP) on May 1, 2014
- A 2018 tax return reflecting Mr. Glancy's 12.5 percent ownership interest since May 1, 2014.
- A corporate filing dated February 9, 2016 reflecting the naming change from TSS to SLCP removing Mr. Glancy as a manager and adding him as a member.

(v) *The relief sought.*

Mr. Glancy seeks to retain his legal right, title, and ownership interest in SLCP.

DATED this 26th day of October 2022.

/s/ Jake Taylor
Keith M. Woodwell
Jake Taylor
Attorneys for Petitioner

CERTIFICATION

I, Jonathan Kirk Glancy, hereby certify under penalty of perjury, that all the facts contained herein are true and correct.



Jonathan Kirk Glancy

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October 2022, I served the foregoing document via hand delivery with:

United States District Court – District of Utah
Room 150
South West Temple, Salt Lake City, Utah 84101

I hereby certify that on the 26th day of October 2022, I served the foregoing document via United States Mail, postage prepaid, with:

Cy Castle, Assistant United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111

/s/ Lyndee Aardema